

ANTHONY L. RICCO

ATTORNEY AT LAW

20 VESEY STREET • SUITE 400  
NEW YORK, NEW YORK 10007

TEL (212) 791-3919  
FAX (212) 964-2926  
anryricco@aol.com

February 8, 2020

BY E.C.F.

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

2/14/2020  
The matter will be adjourned for  
45 days to April 7, 2020 at 10:45am  
No ordered

Re: *United States v. Michael Pizarro*, Docket. No. 19 Cr. 588 (PAC)

Paul A. Crotty  
0801

Dear Judge Crotty:

Defense counsel respectfully submits this letter motion requesting that the sentencing of the defendant, Michael Pizarro, which is presently scheduled for Tuesday, February 11, 2020, be continued for sixty days.

This application is being submitted as a result of defense counsel's trial schedule. Defense counsel was recently engaged on trial in the E.D.N.Y. matter of *United States v. Donville Inness*, 18 Cr. 134 (KAM), until January 16, 2020. Shortly thereafter, on January 24, 2020, the Hon. Edward R. Korman issued a scheduling order for counsel to begin trial in the matter of *United States v. Carlos Richard Martinez*, Docket No. 17 Cr. 281 (ERK), after the defendant did not plead guilty at a change of plea hearing, which had been scheduled for January 21, 2020. Jury selection is scheduled for Monday, February 10, 2020; and since January 21, 2020, counsel has been engaged in intense trial preparation. Moreover, since the completion of the *Inness* trial, counsel has been required to devote significant attention to a most important matter, which is presently under seal in the case of *United States v. Nicholas Tartaglione*, Docket No. 16 Cr. 832 (KMK), a death-authorized, quadruple murder case here in the Southern District of New York, in which I serve as Learned Counsel.

For all of the reasons set forth above, defense counsel requests a 60 day continuance of sentencing on behalf of the defendant, Michael Pizarro.

Thank you for your consideration of this application. If there are any questions, or if additional information is required, please contact me at your Honor's convenience.

Respectfully,

*Anthony L. Ricco*

Anthony L. Ricco

ALR/jh

cc: A.U.S.A. Benet Kearney (By E.C.F.)  
A.U.S.A. Kiersten Fletcher (By E.C.F.)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2-14-2020